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## **U.S. Department of Justice**

United States Attorney Eastern District of New York

SK

F. #2011R00783

271 Cadman Plaza East Brooklyn, New York 11201

March 30, 2015

By FedEx

Michael Bachrach 276 Fifth Avenue Suite 501 New York, NY 10001 Steve Zissou & Associates 42-40 Bell Blvd., Suite 302 Bayside, NY 11361

Re: United States v. Agron Hasbajrami Criminal Docket No. 11-623 (S-1) (JG)

Dear Sirs:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find additional discovery materials, consisting of an additional archive of jihadist websites, disk Bates-numbered 1136. On February 24, 2015, the government provided notice of its intent to call Evan Kohlmann to testify as an expert at trial and noted that Mr. Kohlmann is expected to testify as to, <u>inter alia</u>, the content of certain websites at the time of the events in the government's case; this is expected to include the websites contained on the disk Bates-numbered 1136.

If you have any questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/Saritha Komatireddy

Saritha Komatireddy Seth D. DuCharme Matthew S. Amatruda

**Assistant United States Attorneys** 

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## Enclosure

cc: Clerk of Court (JG) (w/o enclosures)